Georgia-Pacific Corporation

Environmental Affairs
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September 8, 2005

Office of Air and Radiation Docket
Attention Docket No. OAR-2004-0094
U.S. Environmental Protection Agency

Dear Sir or Madam:

Re: **EPA Notice of Reconsideration of Final Rule and Proposed Rule, National Emission Standards for Hazardous Air Pollutants; General Provisions**

Georgia-Pacific Corporation ("GP" or "the Company") welcomes the opportunity to comment on EPA's Notice of Reconsideration of Final Rule and Proposed Rule, National Emission Standards for Hazardous Air Pollutants [NESHAP]; General Provisions [70 Fed. Reg. 43992 (July 29, 2005)]. GP is a major manufacturer of pulp, paper and wood products, with facilities located throughout the United States that are subject to a variety of NESHAPs, and will be directly affected by this proposed rule.

In addition to submitting the following comments, GP, as a member of the American Forest and Paper Association (AF&PA), wishes to support and incorporate by reference the comments being submitted by the American Forest and Paper Association, Alliance of Automobile Manufacturers, American Petroleum Institute, National Petrochemical Refiners Association, and the Air Permitting Forum (collectively, the "Associations").

GP strongly supports EPA's proposal to eliminate recordkeeping requirements for startups and shutdowns during which applicable emission standards are not exceeded.

a. EPA has already promulgated changes that eliminated detailed reporting of startups and shutdowns when applicable emission standards are not exceeded.

Under the current General Provisions[1], facilities are required to maintain detailed records of each startup and shutdown, including information on whether the facility's Startup, Shutdown and Malfunction Plan (SSMP) was followed and whether there was an exceedance of the emission limit during the startup or shutdown. As discussed in the preamble[2] to this Notice, in a May 30, 2003 final rule[3] EPA changed the reporting requirements of 40 CFR 63.10(d)(5)(i) so that regulated sources did not have to submit specific details of startups and shutdowns when applicable emission standards were not exceeded. This common-sense change relieved facilities

[1] 40 CFR 63.10
[2] 70 *FR* 43994
[3] 68 *FR* 32586

of the burdensome requirement to report startups and shutdowns that had no environmental impact. Georgia-Pacific supports EPA's proposal to make a conforming change to the General Provisions that would allow sources not to keep records of these events.

b. Keeping startup and shutdown records for events where there is no environmental impact is a huge burden on industrial facilities

At large, complicated, but well-controlled plant commonly found within Georgia-Pacific, there will typically be a large number of process and control equipment startups and shutdowns; however, the vast majority of these do not result in an exceedance of the underlying emission standard. In fact, unless it is unsafe to do so, operators will bring control equipment on-line before the related process equipment is started, and will keep the control equipment running until the process equipment is safely shut down to prevent any excess emissions. Accordingly, keeping records of these frequent events, in the absence of any environmental impacts, places an unnecessary burden on these facilities and their operators and yields no data of any value. To illustrate this point, we describe the process used at a typical large pulp and paper mill to obtain the currently required startup and shutdown records.

Georgia-Pacific operates a large mill in the southeast that produces high quality printing papers and tissue products. This facility is subject to NESHAP rules under Subpart S (pulp and paper production) for its bleach plant, the low volume high concentration system and the high volume low concentration gas collection system in the pulping area (including two power boilers used as combustion devices), as well as Subpart MM (pulp and paper combustion) for its two recovery furnaces, three smelt dissolving tanks and two lime kilns[4]. Both of these MACT rules require SSMPs and compliance with the recordkeeping requirements of the General Provisions. In the first quarter of 2005, this mill had 384 shutdowns or startups of process equipment in the process areas covered by the two NESHAP rules. *During none of these shutdowns or startups were the underlying emission standards exceeded.* Nevertheless, for each of these 384 cases (or approximately 1,536 on an annual basis), the process operators and environmental department staff had to use the following procedures to assure that accurate records were kept to be in compliance with 40 CFR 63.10(b)(2).

- The operator of the process equipment fills out a computer form for each occurrence stating the duration of the startup or shutdown event, whether the SSMP was followed, and specifies any actions taken during the event.
- After assuring that all required information is supplied, the operator electronically "signs" his name and enters the report into the mill's data collection system.
- Every morning the environmental technician queries the system for any operator reports over the last 24 hours.
- The technician then checks the daily air report to assure that all air exceedances for the day have a corresponding startup, shutdown (or malfunction) event reported on the operator's reports. He, or one of the environmental engineers, follows up on any discrepancies.

[4] The mill will also be regulated under Subpart DDDDD (industrial boilers) effective September, 2007.

- The reports are then printed and filed in a loose leaf binder. [Reports for one quarter completely fill a three inch binder.]

Mill staff estimates that about 5 minutes is required for the process operator to complete each startup or shutdown report. On average, the environmental technician and air engineer spend an additional 15 minutes per event with the error checking, printing and filing duties. Finally, the environmental engineer spends about 20 hours twice a year analyzing and summarizing these data for the semiannual reports. This totals to about 552 hours per year of work for no environmental benefit. It should be apparent from this description that the mill has the systems in place to allow operators to take appropriate actions (and keep appropriate records) during those rare instances when emission standards are, or could be, exceeded. However, in highly competitive manufacturing environments, scarce resources should be directed away from events with no environmental impacts. Removal of reporting and recordkeeping for events without real emission impact will allow mill staff to re-prioritize their schedules to focus on events with real potential environmental impacts.

GP appreciates the opportunity to offer these comments for the record.

Sincerely,

Alan E. Stinchfield, Director
Environmental Technical Support

CC: Mr. Robert Kaufmann